



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SCJ
F. #2017R01691

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 7, 2021

By E-Mail

Kevin J. Keating, Esq.
666 Old Country Road, Suite 900
Garden City, New York 11530
Attorney for Iskyo Aronov

Gordon Mehler, Esq.
Mehler Law PLLC
747 Third Avenue, 32nd Floor
New York, New York 10017-2803
Attorney for Michael Konstantinovskiy

Alan Futerfas, Esq.
Ellen Resnick, Esq.
The Law Offices of Alan S. Futerfas
565 Fifth Ave., 7th Floor
New York, NY 10017
Attorneys for Tomer Dafna

Susan R. Necheles, Esq.
Gedalia Stern, Esq.
Hafetz & Necheles LLP
10 E. 40th St., 48th Fl.
New York, NY 10016
Attorneys for Avraham Tarshish

Todd D. Greenberg
Addabbo & Greenberg
118-21 Queens Blvd. Suite 306
Forest Hills, NY 11375
Attorney for Michael Herskowitz

Re: United States v. Aronov et al.
Criminal Docket No. 19-408 (MKB)

Dear Defense Counsel:

Pursuant to the Court's May 6, 2021 order regarding the defendant's motion for a bill of particulars dated (ECF No. 181), please see the attached Exhibits A and Exhibit B.

Exhibit A contains a list of the individuals who were anonymized in the Indictment and Complaint-In-Intervention filed by the Civil Division of the U.S. Attorney's Office (the "Civil Complaint"), United States v. Aronov et al., 16 CV 04853 (MKB), as well as identified individuals who worked with or for My Ideal Property Inc. ("MIP"), National Homeowners Assistance Inc. ("NHA"), Exclusive Homes Realty Group Inc. and Exclusive Homes NY, LLC (collectively, "Exclusive Homes"), Homeowners Solutions Group LTD

("HSG") or myshortsale.com that government believes either participated in or facilitated the charged Short Sale Scheme as unindicted co-conspirators.

Exhibit B is a list of completed or attempted short sales that the government alleges were part of the MIP and Exclusive Homes Short Sale Schemes. In addition to the short sale transactions described in the Indictment and the Civil Complaint (high-lighted in pink), at this time, the government anticipates that the properties high-lighted in yellow on Exhibit B are ones for which the government may present evidence at trial.

As the government does not typically name unindicted co-conspirators in publicly filed documents for a variety of reasons, including the potential of unfair prejudice to those individuals, the government has not filed Exhibits A or B on the docket.

Very truly yours,

MARK J. LESKO
Acting United States Attorney

By: /s/
Shannon C. Jones
John Vagelatos
Assistant U.S. Attorneys
(718) 254-6379 (S. Jones)

Attachments

cc: Clerk of the Court (MKB) (by ECF)(w/o attachments)